

15 September 2025

Our ref: D2025/106983

Erin Matarazzo
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Mount Piper to Wallerawang Transmission Project (SSI-70279722) – EIS

Dear Ms Matarazzo,

WaterNSW appreciates the opportunity to provide advice regarding the Environmental Impact Statement (EIS) for the Mount Piper to Wallerawang Transmission Project (SSI-70279722).

WaterNSW has reviewed the Mount Piper to Wallerawang Transmission Line Upgrade Project EIS (dated August 2025, prepared by Transgrid) and associated supplementary documents in preparation of our response.

Our response considers the:

- interface with WaterNSW lands and assets, including the Fish River Water Supply Scheme, and
- requirements as per section 171 A (3) of the Environmental Planning and Assessment Regulation (2021) that apply for developments located within the Sydney Drinking Water Catchment.

Impacts to existing water supply infrastructure

Within the proposed transmission line project footprint, WaterNSW owns Lot 1 DP 567915. Located on this lot are infrastructure and easements related to the Fish River Water Supply Scheme, including a pipeline and water tank. Further, the water supply pipeline and associated infrastructure cross the project footprint at various locations along its alignment. Transgrid has consulted with WaterNSW as an affected landholder and is in negotiations with WaterNSW for access and use of this lot during construction.

Of greatest concern to WaterNSW is where the project access tracks cross over the shallow pipeline, especially around access point 4 and at construction compound 1. Any interaction with this pipeline or system components has the potential to disrupt WaterNSW's ability to supply water to its customers (Oberon and Lithgow Councils, Mount Piper power station, and about 230 properties along its route), which poses a significant risk to WaterNSW.

The EIS has not adequately addressed the interaction with the Fish River Water Supply Scheme from construction of the project, nor nominated the risks or included appropriate asset protection measures. While consultation with WaterNSW is suggested, the EIS does not propose any specific protection measures. In our response to the SEARs (our ref: D2024/37611) we requested a detailed assessment of potential impacts to WaterNSW's Fish River Pipeline and associated assets and infrastructure, and WaterNSW's ability to access, operate and maintain these assets be included in the EIS. The EIS briefly describes the interaction with the Fish River Scheme at sections 3.5.3.2, 13.7, 13.3.7.1 and 13.4.2.6 as well as

in Technical Report 4, however these references do not include an impact assessment, they instead describe the existing landuse and make statements only, including 'no direct impact'.

WaterNSW considers that the project poses substantial risks to the Fish River Water Supply Scheme during construction and the following must be considered further and mitigated against:

- Loading over the pipelines (access tracks and construction compounds).
- Damage from vibration and ground movement.
- Electrification of the metal pipeline.
- Restrictions to WaterNSW access and egress.

Noise and Vibration

The EIS does not make specific mention of the potential impact to the Fish River Pipeline from construction works and access, nor does it identify the Scheme as a sensitive receiver. It is noted that mitigation measure NV1 includes the development of a Construction Noise and Vibration Management Plan (CNVMP), which is supported by WaterNSW, however it does not specify buried infrastructure or the Fish River Pipeline (unlike the specific mention of sensitive receivers, sensitive habitats and heritage structures). This does not give WaterNSW any confidence that the impact to and mitigation of potential impacts on the Fish River Supply Scheme have been considered. As such WaterNSW requests that the Proponent include a mitigation measure to minimise vibration emitted from pre-construction minor works, road upgrades, construction, upgrading or decommissioning of the development in the locations closest to the Fish River pipeline.

Further, in order to protect the environment and critical infrastructure, the proponent should commit to and include the following mitigation measures in their project:

General safeguards:

- a) Consult with the applicable public authority or service provider where works are undertaken on or in the vicinity of infrastructure or utilities.
- b) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development.
- c) Minimise erosion and control sediment generation.
- d) Ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with *Best Practice Erosion and Sediment Control* (IECA, 2008), *Managing Urban Stormwater – Soils and Construction Volume 1* (Landcom, 2004), *Managing Urban Stormwater – Soils and Construction Volume 2A Installation of Services* (DECC, 2008) and *Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads* (DECC, 2008), or their latest versions.
- e) Within the project footprint, a pre-condition assessment of assets, infrastructure and the general condition of the land at risk of impact during construction within the project footprint must be completed prior to works commencing and on completion of works to inform the requirements for rectification or rehabilitation.

Specific safeguards – Fish River Water Supply Scheme

- a) The Proponent must not impact the WaterNSW Fish River Water Supply Scheme.
- b) Through ongoing consultation and prior to construction commencing, the proponent must confirm with WaterNSW any specific asset protection requirements for use of access tracks, laydowns or construction compounds in the vicinity of the Fish River Scheme. Details of any specific requirements must be included in the Traffic and Transport Management Plan.
- c) The Proponent must ensure unobstructed access to all components of the Scheme is maintained for WaterNSW during both the construction and operation.
- d) The Proponent must ensure that the project works are designed, constructed and operated in such a way that does not impact the environment or restrict WaterNSW from operating and maintaining the water supply scheme (including access to inspection points and scour valves). WaterNSW

requests direct consultation regarding construction of the project to ensure our assets are adequately considered and protected.

- e) Prior to construction commencing, the proponent must enter into an agreement with WaterNSW for access and use of WaterNSW Lot 1 Deposited Plan 567915.
- f) Unless otherwise agreed with Water NSW, the project must not trigger the maximum allowable limits set within the German Standard DIN 4150 – Part 3 – Structural Vibration Part 3: Effects of vibration in structures, when measured at the Fish River Water Supply Pipeline or another agreed location.

Where the proponent has already committed to the above, we request that they advise in the response to submission's document the corresponding mitigation measures.

Water quality in the Sydney Drinking Water Catchment

Based on our review, WaterNSW requests the following be prepared/updated in consultation with WaterNSW prior to the commencement of construction activities:

- a Soil and Water Management Plan for the construction and operational Phases of the development. The plan shall:
 - have consideration for vegetation clearing, susceptibility to erosion for the works proposed, and include location and details of existing erosion issues and mitigation measures across the project area
 - provide specific details for the construction/upgrade of the proposed waterway crossings to reduce erosion and sediment risks and subsequent water quality impacts
 - include a groundwater dewatering management plan where proposed excavation works are anticipated to intercept groundwater including testing of intercepted groundwater to inform discharge requirements and suitable management i.e. reuse or disposal options for potential contamination
 - include a groundwater Trigger Action Response Plan that will be implemented in the event that groundwater inflows are greater than expected
- an Emergency Management Plan including Flood Risk Management Plan highlighting potential impact on water quality during an emergency/flooding and when relevant authorities shall be notified during a water quality incident, and
- management and maintenance of stormwater management measures as part of an Operational Environmental Management Plan.

It is requested that WaterNSW be listed as a stakeholder in any further consultation on the project, and that we are given the opportunity to provide further comment on the Responses to Submission and any associated draft Consent conditions.

If you have any questions, please contact Rizwana Rumman and Justine Clarke via email at environmental.assessments@waternsw.com.au

Yours sincerely,



MARY KNOWLES
A/Head of Catchment & Land Management